

EXHIBIT A

MCKEE FOODS CORPORATION

vs.

BFP INC., et al.

CARTER LAWRENCE

November 25, 2024

Checuga Reporting, Inc.

(615)499-9320

scheduling@checugareporting.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

MCKEE FOODS CORPORATION

Plaintiff,

vs.

Case No. 1:21-CV-00279

BFP INC. D/b/a THRIFTY MED PLUS
PHARMACY, STATE OF TENNESSEE,
And CARTER LAWRENCE in his Official
Capacity as COMMISSIONER OF THE
TENNESSEE DEPARTMENT OF
COMMERCE AND INSURANCE,

Defendants.

Video Deposition of:

CARTER LAWRENCE

Taken on behalf of the Plaintiff
November 25, 2024

Commencing at 9:16 a.m. CST

Checuga Reporting, Inc.
Michelle Cessna, LCR, RPR
michelle@checugareporting.com
(615) 499-9320

1 sound more formal than it really is, but set up
2 this group in order to make sure that there
3 would be proper information sharing and
4 involving -- getting legal opinion in order to
5 make sure that we did what the law requires of
6 us and that we would stay on track for all
7 relevant deadlines.

8 Q. Does this group discuss ERISA preemption?

9 A. We have discussed ERISA preemption.

10 Q. And tell me what the substance of that
11 discussion was.

12 A. I believe that we would have asked legal
13 counsel about the relevant court decisions and
14 looked at the law that we had and discussed the
15 path forward, which, as I mentioned earlier,
16 was -- is to enforce the law that we have
17 unless a court told us otherwise, but to move
18 forward with the implementation of the State
19 law.

20 Q. Including against self-insured ERISA
21 plans, correct?

22 A. Yes.

23 Q. Obviously not everyone whom we have
24 identified as being part of this PBM group is
25 in the PBM section. Is -- is there a reason